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8 Attorney for Plaintiffs

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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF ARIZONA**  
12

13 Kamran Madani and Abolfalz Vaghef,  
14 plaintiffs,  
15 vs.  
16 BHVT Motors, Inc.,  
17 defendant.

No. CIV 04-1897-PHX-RCB

**Plaintiffs' Proposed Voir Dire  
Questions**

18 Plaintiffs respectfully submit the following proposed voir dire questions:

19 Dated the 10<sup>th</sup> day of May 2006.

20 s/ Stephen G. Montoya  
21 Stephen G. Montoya  
22 MONTOYA JIMENEZ P.A.  
23 3200 North Central Avenue, Ste. 2550  
24 Phoenix, Arizona 85012-2490  
25 Attorney for Plaintiffs  
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**PROPOSED JURY VOIR DIRE QUESTIONS**

1. Have you ever had management or supervisory responsibilities in the workplace?
2. Have you ever had the authority to hire or fire people?
3. Have you ever worked in a human resources department or a personnel office?
4. Has anyone in your family or a friend ever worked in a personnel office or a human resources department?
5. Have you, anyone in your family, or a friend ever owned your own business?
6. If yes, what type of business?
7. Do you know any of the other prospective jurors?
8. Have you, anyone in your family, or a friend ever worked for a lawyer or law firm? If yes, please list who (you, family, friend), what job, and when.
9. Have you, anyone in your family, or a friend ever worked for the court system?
10. If yes, please list who (you, family, friend), what job, and when.
11. Have you ever served as a juror?
  - If yes, how many times?
  - When?
  - What type of case was it?
  - What was the result?
  - How did you feel about jury service?
12. Have you, anyone in your family, or a friend ever sued or been sued?
  - If yes, who sued or was sued (please include relation to you):
  - Why?
  - When?
  - What was the result?
  - Were you satisfied with the result?
13. Have you, anyone in your family, or a friend ever been a witness in a lawsuit?
14. If yes, what kind of case was it?
15. Have you, anyone in your family, or a friend ever been accused of discrimination?

- 1 16. Are any of you prejudiced against Arabs?
- 2 17. Are any of you prejudiced against Iranians?
- 3 18. Are any of you prejudiced against Muslims?
- 4 19. Are you prejudiced against people not born in the United States?
- 5 20. What do you think about lawsuits in general?
- 6 21. Do you agree with this statement: "The law should allow an employer to select any  
7 qualified applicant for a position as long as the selection is not related to race, gender  
8 or other protected persons?"
- 9 22. How does each member of the jury panel feel about large verdicts?
- 10 23. How does each member of the jury panel feel about awarding damages where there is  
11 no physical injury?
- 12 24. How does each member of the jury panel feel about punitive damages?
- 13 25. Do any of you feel that employees have too much say in the work place?
- 14 26. Do any of you feel that the federal government has no right to regulate an employer's  
15 right to hire and fire an employee?
- 16 27. Does any member of the jury panel feel that racial minorities or women sometimes take  
17 advantage of their status?
- 18 28. Does any member of the jury panel feel that no person should be entitled to sue on the  
19 basis of harassment at the work place due to race, color, national origin gender or  
20 religion?
- 21 29. Do you think that claims of racial harassment are exaggerated as problems in the  
22 workplace?
- 23 30. What are your favorite magazines?
- 24 31. What are your favorite television shows?
- 25 32. What books have you read lately?
- 26 33. What people do you admire most?
- 27 34. What bumper stickers do you have on your automobile?
- 28

1 35. Will you be able to follow the law that the court gives you to apply to the facts of this case  
2 even if you disagree with it?

3 36. How many of you (if any) cannot be fair to either Mr. Madani or Mr. Vaghef?

4 37. Is anything about you that we have not asked you about that could cause you to be  
5 prejudiced against either Mr. Madani or Mr. Vaghef?

6 38. If yes, what is it?

7 RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of May 2006.

8 By s/ Stephen G. Montoya

9 Stephen G. Montoya

**Montoya Jimenez, P.A.**

10 3200 North Central Avenue, Suite 2550  
11 Phoenix, Arizona 85012

12 Attorney for Plaintiffs  
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**CERTIFICATE OF SERVICE**

☒ I hereby certify that on May 10, 2006, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Stephanie K. Osteen  
Akin Gump Strauss Hauer & Feld LLP  
1700 Pacific Avenue, Suite 4100  
Dallas, Texas 75201

Attorney for Defendants

☒ I further certify that on May 11, 2006, the attached document was hand-delivered to:

The Honorable Robert C. Broomfield  
United States District Court for the District of Arizona  
Sandra Day O'Connor United States Courthouse  
401 West Washington Street  
Phoenix, Arizona 85003

s/ Stephen G. Montoya